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Attorneys for Defendant Sequel Youth  
and Family Services, LLC

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

A.S. a pseudonym,  
Plaintiff,  
v.

STATE OF OREGON, by and through its  
Department of Human Services, RED ROCK  
CANYON SCHOOL, L.L.C., a limited liability  
company, RED ROCK CANYON SCHOOL  
NON-PROFIT ORGANIZATION, a foreign  
nonprofit; SEQUEL TSI HOLDINGS, LLC, a  
foreign limited liability company; SEQUEL  
YOUTH AND FAMILY SERVICES, LLC, a  
foreign limited liability company; VIVANT  
BEHAVIORAL HEALTHCARE, LLC, a  
foreign limited liability company; SEQUEL  
YOUTH SERVICES OF RED ROCK  
CANYON, LLC, a foreign limited liability  
company. MARILYN JONES in her individual  
and official capacity; JANA MCLELLAN, in  
her individual and official capacity; GLENDA  
MARSHALL in her individual and professional  
capacity; RYAN SANTI, in his individual and  
official capacity; GENA PALM, in her  
individual and professional capacity; and JOHN  
STUPAK, in his individual and official  
capacity; and CARE YOUTH  
CORPORATION, a foreign corporation,  
Defendants.

NO. 3:23-cv-01643

STIPULATION AND ORDER FOR  
VOLUNTARY DISMISSAL WITH  
PREJUDICE PURSUANT TO F.R.C.P. 41(a)  
(all claims and cross claims, all defendants)

NOTED ON MOTION CALENDAR:  
**(SAME DAY MOTION)**

STIPULATION AND ORDER FOR VOLUNTARY  
DISMISSAL WITH PREJUDICE PURSUANT TO  
F.R.C.P. 41(a)(1)(A)(ii) - 1

(CASE NO. 3:20-cv-05468)


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**STIPULATION**

IT IS HEREBY STIPULATED AND AGREED between the undersigned parties, through their respective counsel of record, that Department of Human Services; Red Rock Canyon School, L.L.C.; Red Rock Canyon School Non-Profit Organization; Sequel TSI Holdings, LLC; Sequel Youth And Family Services, LLC; Vivant Behavioral Healthcare, LLC, Sequel Youth Services Of Red Rock Canyon, LLC; Jana McLellan; Glenda Marshall; Ryan Santi; Gena Palm; John Stupak, And Care Youth Corporation may be dismissed from the above-entitled matter with prejudice and without any cost to any party pursuant to the Federal Rules of Civil Procedure 41(a). The parties similarly stipulate that the entire action shall be dismissed with prejudice.

DATED this \_29th\_ day of October,

2024. ROSS LAW LLC

By  10/28/2024  
Jeremiah Ross, OSB #105980  
Counsel for Plaintiff

FAIN ANDERSON VANDERHOEF  
ROSENDAHL  
O'HALLORAN SPILLANE, PLLC

By /s/Michelle L. Hyer  
Eron Z. Cannon, OSB #145794  
Michelle L. Hyer, PHV Pending  
Counsel for Defendant Sequel Youth  
and Family Services, LLC

STIPULATION AND ORDER FOR VOLUNTARY  
DISMISSAL WITH PREJUDICE PURSUANT TO  
F.R.C.P. 41(a)(1)(A)(ii) - 2

(CASE NO. 3:20-cv-05468)

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OREGON DEPARTMENT OF JUSTICE  
ASSISTANT ATTORNEY GENERAL

By /s/Drew K. Baumchen  
Craig M. Johnson, OSB # 080902  
Drew K. Baumchen, OSB # 045032  
Counsel for Defendants State of Oregon,  
Marilyn Jones, Glenda Marshall, and Jana  
McLellan

CARE YOUTH CORPORATION

DocuSigned by:  
By Jonathan O. Hafen  
Jonathan Hafen, Corporate  
Representative

### **ORDER**

Based upon the foregoing Stipulation, IT IS HEREBY ORDERED, ADJUDGED and DECREED that Defendants State of Oregon, by and through its Department of Human Services; Red Rock Canyon School, L.L.C.; Red Rock Canyon School Non-Profit Organization; Sequel TSI Holdings, LLC; Sequel Youth And Family Services, LLC; Vivant Behavioral Healthcare, LLC, Sequel Youth Services Of Red Rock Canyon, LLC; Jana McLellan; Glenda Marshall; Ryan Santi; Gena Palm; John Stupak, And Care Youth Corporation are dismissed from the above-entitled matter with prejudice and without any cost to any party. This action is also dismissed with prejudice and the Clerk of the Court is directed to close this case.

DATED this 1st day of November, 2024

Michael W. Mosman  
THE HONORABLE MICHAEL W. MOSMAN  
U.S. DISTRICT COURT JUDGE

STIPULATION AND ORDER FOR VOLUNTARY  
DISMISSAL WITH PREJUDICE PURSUANT TO  
F.R.C.P. 41(a)(1)(A)(ii) - 3

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